

EXHIBIT C**Defendants' Proposed Constructions and Citations to Evidence for Claim Terms in
U.S. Patent No. 6,724,435 (the "435 Patent")**

No.	Claim Terms	Defendants' Proposed Construction	Defendants' Intrinsic and Extrinsic Evidence
1.	"individual color"	"a linear combination of colors or color components".	Declaration of Robert L. Stevenson. '435 patent, col. 1:19-21, 1:60.
2.	"without affecting the hue or the saturation of any other individual color"	Ordinary meaning (incorporating the construction of "individual color").	n/a
3.	"arbitrary interval of integers"	Ordinary meaning.	n/a
4.	"characterizing"	Indefinite.	Declaration of Robert L. Stevenson. '435 Patent at 6:40-50.
5.	"Input image pixel"	"image data including an integer row, an integer column, and color component values for each of red, green, and blue".	Declaration of Robert L. Stevenson. '435 patent at 5:55-59 6:58-7:4, 9:40-61, 11:40-26:20.
6.	"Forming a corresponding plurality of output image pixels having said selected individual color"	"Forming a plurality of output image pixels that each correspond to one of the plurality of input image pixels that have said selected individual color in the real time digital video input image with the hue or the saturation selected to be independently changed, the output image pixels having said selected individual color".	Declaration of Robert L. Stevenson. '435 patent at 11:14-30.
7.	"By performing arithmetic and logical operations"	Indefinite as to whether this clause modifies "identifying", "changed", or both terms.	Declaration of Robert L. Stevenson.
8.	"Evaluating" and	Indefinite.	Declaration of Robert L. Stevenson.

	“Evaluated”		’435 Patent at 3:32-40; 4:15-33.
9.	“viewer”	Indefinite – illustrates that method steps are performed by a human as discussed below.	<p>Declaration of Robert L. Stevenson.</p> <p>’435 Patent at 2:30-40, 3:50-4:32, 4:55-5:12, 26:21-65</p> <p>Defendants object to Plaintiff’s last minute disclosure of a construction for “viewer.” Plaintiff did not provide the construction until March 16, 2020, the deadline for filing under P.R. 4-3. Accordingly, Defendants were foreclosed from the ability to investigate and/or identify any extrinsic evidence that could be used to challenge Plaintiff’s construction. Plaintiff’s proposed construction should be stricken.</p>
10.	<p>As applied to Claim 17: The combination of method steps and system elements in a single system claim:</p> <p><i>operating</i> said master control device . . .;</p> <p><i>selecting</i> an independent color hue control delta value or an independent color saturation control delta value . . .;</p> <p><i>identifying</i> a plurality of said input image pixels . . .;</p> <p><i>determining</i> corresponding output image pixel values . . .;</p> <p><i>displaying</i> a real time digital video output image . . .</p>	Indefinite – A claim that “recites both a system and a method for using that system” is invalid as indefinite. <i>IPXL Holdings v. Amazon.com</i> , 430 F.3d 1377, 1384 (Fed. Cir. 2005).	<p>Declaration of Robert L. Stevenson.</p> <p>’435 patent at 26:21-65; see also 2:30-40; 3:50-4:32; 4:55-5:12</p>